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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency Office of Pesticide Programs

April 10, 2007

Donna L. Butler
PPG Industries, Inc.
4325 Rosanna Drive
Allison Park, PA 15101

Subject: Pittabs G65
EPA Registration No. 748-284
Application Date: January 8, 2007
Receipt Date: January 11, 2007

Dear Ms. Butler:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with a condition

Condition

Your label requires the use of a daily test kit for swimming pools. Therefore, you must add the re-entry language under the "Routine Chlorination" directions for use.

"Re-entry into treated pools is prohibited above levels of 4ppm due to risk of bodily harm."

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at (703) 308-6345.

Sincerely,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

[EPA MASTER LABEL COPY]

PITTABS-G65
CALCIUM HYPOCHLORITE TABLETS

Bactericide - Algaecide - Bleach
for Industrial Applications

(Optional Marketing Claims:)

- **Potable / Industrial Water Chlorination**
- **This product provides a steady source of available chlorine.**
- **Kills Bacteria, Controls Algae, Destroys Organic Contaminants**
- **"Now with Anti-Scale Additive" or "With Scale Inhibitor"**

EPA Reg. No. 748-284
EPA Est. No. 58401-IL-1

ACTIVE INGREDIENT: Calcium Hypochlorite. . . 68%
OTHER INGREDIENTS: 32%
Minimum 65% Available Chlorine

KEEP OUT OF REACH OF CHILDREN
DANGER

Do not mix with other chemicals.
Do not add water to product – Add product to water
See additional precautionary statements on back label.

FIRST AID: If in eyes, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. **If on skin or clothing,** take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. **If swallowed,** call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. **If inhaled,** move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. **Note to physician,** probable mucosal damage may contraindicate the use of gastric lavage. ***Contact 1-412-434-4515 or your poison control center for 24-hour emergency medical treatment information. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.***

Manufactured by
PPG INDUSTRIES, INC.
One PPG Place
Pittsburgh, PA 15272
Emergency Telephone Number: 1-412-434-4515

NET WT. 100 lbs. (45 kg)

[1/8/07 EPA pending update, approved xxx]

ACCEPTED
with COMMENTS
in EPA Letter Dated:
04-10-07
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.
748-284

PRECAUTIONARY STATEMENTS -
HAZARDS TO HUMANS AND DOMESTIC ANIMALS -
DANGER - Highly Corrosive. Causes irreversible eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing and shoes before reuse. May be Fatal if swallowed. Irritating to Nose and Throat. Avoid breathing dust.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent! Mix only with water. **Never add water to product. Always add product to large quantities of water.** Use only a clean, dry utensil made of metal or plastic each time product is taken from the container. Do not mix with any other chemicals. **Do not add this product to any dispensing device containing remnants of any other product. Such use may cause violent reaction leading to fire or explosion.** Contamination with moisture, acids, organic matter, other chemicals or easily combustible materials such as petroleum or paint products may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of a fire or explosion. In case of contamination or decomposition, do not reseal container. If possible isolate container in open air or well-ventilated area. Flood with large volumes of water, if necessary.

STORAGE AND DISPOSAL: Keep in original container in a cool, dry, well-ventilated place. Keep container closed when not in use. Keep away from heat sources, sparks, open flames and lighted tobacco products. **Container Disposal** - Do not reuse container. Residual material remaining in empty container can react to cause fire. Thoroughly flush empty container with water then destroy by placing in trash collection. **Pesticide Disposal** - Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Do not contaminate water, food, or feed by storage or disposal. **In Case of Fire** - Drench with water. Calcium hypochlorite supplies oxygen; therefore, attempts to smother fire with a wet blanket, carbon dioxide, or a dry chemical extinguisher are ineffective. **In Case of Spill or Leak** - Use extreme caution. Contamination may cause fire or violent reaction. If fire or reaction occurs in area of spill, douse with plenty of water. Otherwise sweep up spilled material, using a clean, dry shovel and broom and dissolve spilled material in water. Then immediately use solution as directed.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

<u>COOLING TOWER / EVAPORATIVE CONDENSER WATER:</u>
Slug Feed Method - Initial dose: When system is noticeably fouled, apply 10 to 20 ounces of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Repeat until control is achieved. **Subsequent dose:** When microbial control is evident, add 2 ounces of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled system must be cleaned before treatment is begun.
Intermittent Feed Method - Initial dose: When system is noticeably fouled, apply 10 to 20 ounces of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Apply half (or 1/3, 1/4, or 1/5) of this initial dose when half (or 1/3, 1/4, or 1/5) of the water in the system has been lost by blowdown. **Subsequent dose:** When microbial control is evident, add 2 ounces of this product per 10,000 gallons of water in the system to obtain a 1 ppm residual. Apply half (or 1/3, 1/4, or 1/5) of this initial dose when half (or 1/3, 1/4, or 1/5) of the water in the system has been lost by blowdown. Badly fouled system must be cleaned before treatment is begun.
Continuous Feed Method - Initial dose: When system is noticeably fouled, apply 10 to 20 ounces of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. **Subsequent dose:** Maintain this treatment level by starting a continuous feed of 1 ounce of this product per 3,000 gallons of water lost by blowdown to maintain a 1 ppm residual. Badly fouled system must be cleaned before treatment is begun.
Briquettes or Tablets - Initial dose: Initially slug dose the system with 10 ounces of this product per 10,000 gallons of water in the system. Badly fouled system must be cleaned before treatment is begun. **Subsequent dose:** When microbial control is evident, add 2 ounces of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled system must be cleaned before treatment is begun.

[Note: the following is alternate wording for specific tableted product labeling.]
COOLING TOWER/EVAPORATIVE CONDENSER WATER (Continuous Feed Method):
INITIAL DOSE: When system is noticeably fouled, apply 2 to 4 tablets (10 to 20 oz.) of this product per 10,000 gallons of water in the system to obtain 5 to 10 PPM available chlorine.
SUBSEQUENT DOSE: Maintain this treatment level by starting a continuous feed using a tablet hypochlorinator. To dose use 1 tablet of this product (5 oz.) per 15,000 gallons of water lost by blowdown to maintain a 1 PPM residual. Badly fouled system must be cleaned before treatment is begun.

Cooling Tower and Heat Exchange Surface – A clogged or fouled system should be mechanically cleaned to remove all physical soil prior to beginning treatment. Initially, treat by adding enough calcium hypochlorite to provide 10 ppm available chlorine (2 ounces per 1000 gallons) as a shock dosage and circulate it thoroughly through the system. Then, for continuous preventive control of algae and slime growth, regularly add enough calcium hypochlorite to the recirculation system to maintain a free chlorine residual between 0.5 and 1.0 ppm. Other water condition factors, such as pH, should be controlled as recommended by the equipment manufacturer.

PPG calcium hypochlorite tablets can serve an important role in control of Legionella bacteria in cooling water towers. A concentration of 2 ppm free available chlorine has been shown to be capable of killing free Legionella pneumophila bacteria. Legionella bacteria can, however, survive chlorination when shielded inside amoebae, other protozoa or slime, so it is important to have an overall Legionella control strategy that includes controlling the growth of these other organisms and microbial communities and limiting the supply of micronutrients that sustain such microbial growth. Regular chlorination with calcium hypochlorite can help to limit the supply of assimilable organic carbon (AOC) in the water. These recommendations are based on best practices from the industry, but are presumptive in nature. PPG Calcium Hypochlorite Tablets have not been tested for effectiveness against Legionnaires Disease Bacteria (LDB). There is no evidence that chemical treatment will control the growth of LDB under actual operating conditions, reduce transmission of LBD, or prevent Legionnaires' Disease.

SEWAGE AND WASTEWATER TREATMENT:
Effluent Treatment: The disinfection of sewage effluent must be evaluated by determining the total number of coliform bacteria and/or fecal coliform bacteria, as determined by the Most Probable Number (MPN) procedure, of the chlorinated effluent has been reduced to or below the maximum permitted by the controlling regulatory jurisdiction. On the average, satisfactory disinfection of secondary wastewater effluent can be obtained when the chlorine residual is 0.5 ppm after 15 minutes contact. Although the chlorine residual is the critical factor in disinfection, the importance of correlating chlorine residual with bacterial kill must be emphasized. The MPN of the effluent, which is directly related to the water quality standards requirements, should be the final and primary standard and the chlorine residual should be considered an operating standard valid only to the extent verified by the coliform quality of the effluent.

The following are critical factors affecting wastewater disinfection: 1. Mixing: It is imperative that the product and the waste water be instantaneously and completely flash mixed to assure reaction with every chemically active soluble and particulate component of the waste water. 2. Contacting: Upon flash mixing, the flow through the system must be maintained. 3. Dosage/Residual Control: Successful disinfection is extremely dependent on response to fluctuating chlorine demand to maintain a predetermined, desirable chlorine level. Secondary effluent should contain 0.2 to 1.0 ppm chlorine residual after a 15 to 30 minute contact time. A reasonable average of residual chlorine is 0.5 ppm after 15 minutes contact time.
Effluent Slime Control: Apply a 100 to 1000 ppm available chlorine solution at a location which will allow complete mixing. Prepare this solution by mixing 2 to 20 ounces of this product with 100 gallons of water. Once control is evident, apply a 15 ppm available chlorine solution. Prepare this solution by mixing 0.3 ounces of this product with 100 gallons of water.
Filter Beds - Slime Control: Remove the filter from service, drain it to a depth of 1 foot above the filter sand, and add 16 ounces of this product per 20 square feet evenly over the surface. Wait 30 minutes before draining water to a level that is even with the top of the filter. Wait for 4 to 6 hours before completely draining and backwashing the filter.

SEPTIC TANKS (Small Wastewater Treatment Plants):
To fill a residential, or small scale wastewater treatment chlorinator, remove tubes holding tablets, if applicable, and fill as follows:
1. Remove caps and rinse tubes. Clean with water.
2. Fill each tube to top, one tablet at a time.
3. Tablets must lie flat, or tubes will clog.
4. Replace caps and install tubes so they rest in channel in floor of chlorinator.
5. See Manufacturer's chlorinator brochures for additional instructions.

NOTE: This product degrades with age. Use a chlorine test kit and increase dosage, as necessary, to obtain the required level of available chlorine.

HOW TO USE PITTABS-G65 CHLORINATING TABLETS FOR SWIMMING POOLS:

Skimmer Basket: Place one Pittabs-G65 chlorinating tablet for every 5,000 gallons of water directly into the skimmer basket, where they will take from 1-2 days to dissolve. If added to the skimmer basket, keep the circulation system running until the Pittabs-G65 chlorinating tablets have dissolved to prevent buildup of excessive chlorine concentration in the skimmer and waterlines.

Floating Dispenser: Add two Pittabs-G65 chlorinating tablets for every 10,000 gallons of water. Set the feeder at the minimum open position and place in pool. Increase or decrease the size of the openings as needed to maintain the desired free chlorine residual. Pittabs-G65 chlorinating tablets will deliver chlorine slowly (3-4 days) in a floating dispenser.

Skimmer Dispenser: Use as many Pittabs-G65 chlorinating tablets as the gallons of water in your pool. Start with two tablets for every 10,000 gallons of water. The number of Pittabs-G65 chlorinating tablets you need to maintain 1 - 3 ppm free available chlorine varies primarily with your mechanical pool equipment.

Do not throw the tablets directly into the pool or allow tablets to contact plastic or steel pool linings. Do not use in automatic chlorinators.

Regular Treatment For Pools In Use:

Maintain pool water parameters in the ranges recommended below or at levels required by local regulations. Obtain and make use of a pool test kit to measure pH, free chlorine residual, total alkalinity, water hardness, and cyanuric acid concentration.

Parameter	Test Frequency	Recommended Level
pH	Daily	7.2 to 7.6
Free Chlorine Residual	Daily	1 to 3 ppm in unstabilized pools. 2 to 4 ppm minimum in stabilized pools.
Total Alkalinity as $CaCO_3$	Weekly	60-120 ppm
Stabilizer (Cyanuric Acid)	Monthly	20 to 50 ppm
Water Hardness as $CaCO_3$	Monthly	200 ppm minimum

[or instead of the above paragraph and table, use the following paragraph format on smaller packages:

Maintain pool water parameters as follows: adjust pH to 7.2-7.6, free chlorine residual 1-4 ppm, total alkalinity 60-120 ppm, stabilizer 20-50 ppm, and water hardness at 200 ppm minimum. Obtain and make use of a pool test kit to measure the levels. *]*

Initial Chlorination For Swimming Pools: Begin operation of your recirculation equipment. Balance the water by making certain the pool water parameters for pH, Total Alkalinity and Water Hardness are in their proper ranges. Shock Treat the pool using Zappit Shock Treatment. Follow label directions of the product used as recommended. Repeat the treatment until a minimum 1.5 ppm free chlorine has been established. If a stabilizer is used, check and adjust stabilizer to proper level (40 - 50 ppm). Do not enter the water until the free chlorine residual is less than 4 ppm. Begin routine chlorination.

Routine Chlorination: Maintain Total Alkalinity, pH, Water Hardness and Stabilizer concentration of their proper levels.

Floating Dispenser: Add two Pittabs-G65 chlorinating tablets for every 10,000 gallons of water. Set the feeder at the minimum open position and place the dispenser in the pool. Increase or decrease the size of the opening as needed to maintain the desired free chlorine residual. Add more tablets to feeder as needed. Skimmer Basket: Place two Pittabs-G65 chlorinating tablet for every 10,000 gallons of water in the skimmer basket. Add more or fewer tablets to skimmer as needed to maintain the desired free chlorine residual. Keep the circulation system running until the tablets have dissolved to prevent the buildup of excessive chlorine concentration in the skimmer and waterlines.

Actual number of Pittabs-G65 chlorinating tablets and feeder settings required to maintain the desired free chlorine residual will vary with the amount of pool water, sunlight, water temperature, bather load, stabilizer concentration and other factors. Use a high quality and convenient test kit daily to determine and maintain the proper free chlorine residual.

RECIRCULATING COOLING WATER SYSTEMS:
When used as directed, this product effectively controls algal, bacterial and fungal slimes in commercial and industrial cooling towers, influent water systems such as flow through filters and lagoons, heat exchange water systems, industrial water scrubbing systems, brewery pasteurizers, and industrial air washing systems equipped with a mist eliminator. Add this product using a bypass feeder or broadcast into an open area in the system such as a cooling tower basin or deck, where sufficient agitation is present to promote rapid mixing and dissolution.
DOSAGE RATES: Initial dose: When the system is noticeably fouled, add this product at the rate of 0.6 to 1.25 lbs. per 10,000 gallons of water contained in the system. Repeat initial dosage until at least one ppm chlorine residual is established for at least 4 hours. **Subsequent dose:** When microbial control is evident, add this product at the rate of 0.2 lbs. per 10,000 gallons of water contained in the system. Repeat as needed to maintain at least one ppm chlorine residual for at least 4 hours.

ONCE-THROUGH INDUSTRIAL COOLING WATER SYSTEMS:
For the control of algal, bacterial and fungal slimes in once-through and closed-cycle fresh and sea water cooling systems, cooling ponds, canals and lagoons, add this product to the system inlet water or before any other contaminated area in the system.
DOSAGE RATES: Initial dose: When the system is noticeably fouled, add this product at the rate of 0.6 to 1.25 lbs. per 10,000 gallons of water contained in the system. Repeat initial dosage until at least one ppm chlorine residual is established for at least 4 hours. **Subsequent dose:** When microbial control is evident, add this product at the rate of 0.2 lbs. per 10,000 gallons of water contained in the system. Repeat as needed to maintain at least one ppm chlorine residual in the water for at least 4 hours.